

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE
ELIZABETH VEGA RAMOS &
MARTIN RODRIGUEZ COLON
SSN #xxx-xx-8084 / xxx-xx-1157

Debtor

CASE #17-03725 EAG

CHAPTER 11

D.I.P. *Second* REQUEST for EXTENSION of TIME TO FILE PLAN & DISCLOSURE
STATEMENT & TO FILE OUTSTANDING MORs

TO THE HONORABLE COURT:

COMES NOW, the debtor in possession who respectfully informs as follows:

1. On **May 27, 2017** the above captioned debtor filed its petition under the dispositions of Chapter 11 of the Bankruptcy Code. The debtor is an individual and not a Small Business and will continue as debtor in possession pursuant to §1101 and §1107 of Title 11 of the United States Code.
2. The Status hearing was heard on **August 18, 2017** wherein **February 14, 2018** was set as the date by which the Plan and Disclosure Statement would be filed with the Court. This first date for the Plan of Reorganization was extended by this Court until **April 20, 2018**.
3. Notwithstanding, Puerto Rico unfortunately continues in the state of Emergency caused by the two back to back hurricanes in the area of Caguas. Added to this is tax season, and there has been increasing delay in Accountant's office much due to the extended closing of his office post Hurricane Maria, as well as the congestion typical at tax time.
4. Counsel for debtor's office has only been able to re-open fully 2 days ago when she has finally recovered part of her computer system after expensive and extended repair and recovery of the office data destroyed and infected with mold from the hurricanes. Added to this is a previously programmed bankruptcy Convention in Denver, Colorado hosted by National Association of Consumer Bankruptcy Attorneys where we have the privilege of forming part of a panel at the Convention from April 17 to April 24, 2018 when we return to Puerto Rico and to our office.

5. The outstanding MORs have been completed by the Accountant before the intense tax season but were returned for corrections and have been further delayed as a result of the tax season rush already described herein.
6. Under the circumstances debtor requests an additional 60 days, or at least until **June 19, 2018**. WHEREFORE, D.I.P. respectfully prays for an extension of time to:
 - a) submit the pending MORs until **April 30, 2018**;
 - b) to submit the Plan and Disclosure Statement until **June 19, 2018**;
 - c) any other remedy that this Court deems just and proper.

NOTICE

Within fourteen (14) days after service as evidenced by the certification, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (I) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I HEREBY CERTIFY, that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF Filing System which will send a notification, upon information and belief, of such filing to the U.S. Trustee and to all subscribed users & to all others on attached List of Creditors.

JOSE F CARDONA JIMENEZ on behalf of Creditors FRANKLIN CREDIT MANAGEMENT CORP. & SCOTIABANK DE PUERTO RICO jf@cardonalaw.com

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Jenyfer Garcia Soto on behalf of Creditors MMM HEALTHCARE INC. & PMC MEDICARE CHOICE INC. Ferraiuoli, LLC 221 Ponce de Leon Avenue 5th Floor San Juan, PR 00917

RAMON J SANABRIA, CPA 122 CALLE PADIAL CAGUAS, PR 00725

In Caguas, Puerto Rico, this April 17, 2018.

/s/**LA Morales**

LYSSETTE A. MORALES VIDAL

USDC PR #120011

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